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16 **IN THE UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF NEVADA**

18 ROOSEVELT NEROES,
19 Plaintiff,
20 v.
21 FACTORTRUST, INC.,
22 Defendant.

Case No. 2:21-cv-00575-JCM-EJY

**JOINT MOTION AND ORDER
EXTENDING DEFENDANT
FACTORTRUST, INC.'S TIME TO
FILE AN ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT
(FIRST REQUEST)**

23 Plaintiff Roosevelt Neroes ("Plaintiff") and Defendant FactorTrust, Inc. ("FactorTrust"),
24 by and through their respective counsel, file this Joint Motion Extending Defendant
25 FactorTrust's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

26 1. On April 8, 2021, Plaintiff filed his Complaint. The current deadline for
27 FactorTrust to answer or otherwise respond to Plaintiff's Complaint is July 7, 2021.

28 2. On July 6, 2021, counsel for FactorTrust communicated with Plaintiff's counsel
regarding an extension within which to file a response to the Complaint, and Plaintiff's counsel
agreed to the extension.

3. The parties will actively discuss a potential early resolution of this case, and the
parties believe an extension of this nature may save waste of the parties' time and expense. The

1 additional time will allow Plaintiff and FactorTrust time to fully explore such early settlement
2 discussions. Moreover, FactorTrust's counsel will need additional time to review the documents
3 and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith
4 and not for the purposes of delay.

5 4. Plaintiff has agreed to extend the deadline in which FactorTrust has to answer or
6 otherwise respond to Plaintiff's Complaint up to and including August 6, 2021. This is the first
7 motion for extension of time for FactorTrust to respond to Plaintiff's Complaint.

8 Dated this 7th day of July 2021.

9 **Quilling Selander Lownds**
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11 /s/ Jennifer Bergh

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Counsel for Plaintiff

29 **ORDER**

30 The Joint Motion for Extension of Time for FactorTrust, Inc. to file an answer or
31 otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

32 Dated this 8th day of July, 2021.

33 
34 **UNITED STATES MAGISTRATE JUDGE**